

UNITED STATES DISTRICT COURT
for the
Northern District of California

United States of America)
v.)
KOFI SARPONG DANKWAH) Case No.
)
)
)
)
)
Defendant(s)

FILED

JUN 27 2017
SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

3 17 70894

LB

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 30, 2016 in the county of San Francisco in the
Northern District of California, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 1543	Use of false passport

Maximum Penalties: 10 years imprisonment, \$250,000 fine; three years supervised release; \$100 special assessment.

This criminal complaint is based on these facts:

Please see the attached affidavit of DHS Agent Calvin Wong
(Approved as to form Jerome Mayer-Cantú)

Continued on the attached sheet.



Complainant's signature

DHS Agent Calvin Wong

Printed name and title



Judge's signature

Sworn to before me and signed in my presence.

Date: June 27, 2017

City and state: San Francisco, CA

Hon. Laurel Beeler, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Calvin Wong, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a criminal complaint and arrest warrant charging KOFI SARPONG DANKWAH with unlawful use of a false passport in violation of 18 U.S.C. § 1543.

2. I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2510(7), in that I am an officer of the United States empowered by law to conduct criminal investigations and make arrests for offenses enumerated in 18 U.S.C. § 2516. I am also a law enforcement officer of the United States defined within the meaning of the 1930 Tariff Act, 19 U.S.C. § 1589(a), and 18 U.S.C. § 2510(7).

3. I am a Special Agent with the Department of Homeland Security (DHS), Homeland Security Investigations (HSI), currently assigned to the San Francisco Office with the Public Safety Unit. I have been employed by HSI as a Special Agent since March 2010.

4. My experience of enforcing/investigating federal criminal statutes includes, but is not limited to, 18 U.S.C. § 922(g)(1) (felon in possession of a firearm), 21 U.S.C. § 841(a) (possession with intent to distribute controlled substances), 18 U.S.C. § 1028A(a)(1) (aggravated identity theft), and 18 U.S.C. § 1029(a)(2) (access device fraud). In the course of my training and experience, I have used and participated in investigative and enforcement actions that include, but are not limited to, surveillance, execution of state and federal search warrants, wiretaps, and the utilization of criminal informants to advance a case.

5. Since August of 2010, while assigned to the HSI/San Francisco Office, I have been investigating violations in federal law, including a focus on violent crimes and crimes committed by organized transnational gangs. Through my assignment, I have conducted and participated as well as received training in a variety of law enforcement subjects to include, but not limited to, gang organizations, violent crimes, narcotics trafficking, criminal procedure, searches and seizures, and the various gangs and criminal organizations operating in Northern California.

6. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

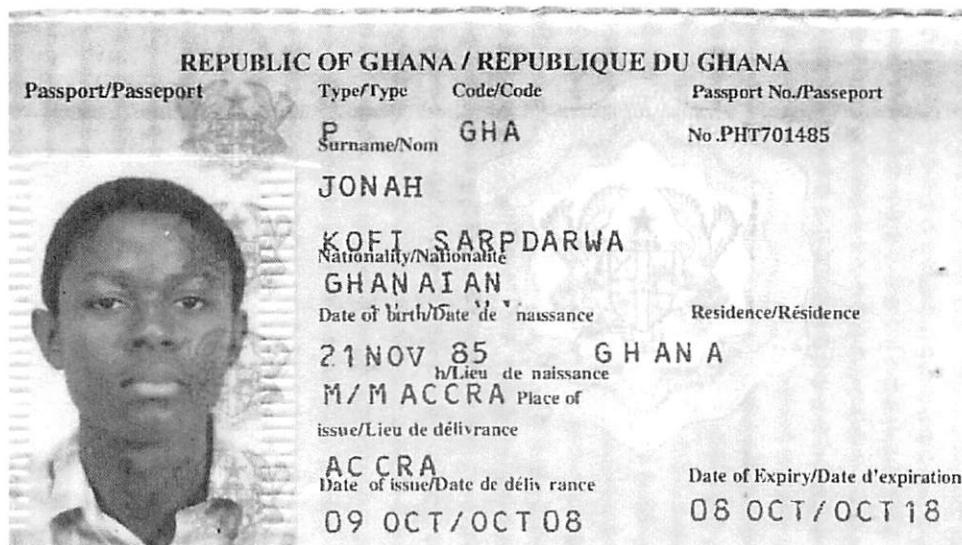
RELEVANT STATUTE

7. 18 U.S.C. § 1543 states, in relevant part: “Whoever willfully and knowingly uses, or attempts to use, or furnishes to another for use any such false, forged, counterfeited, mutilated,

or altered passport or instrument purporting to be a passport, or any passport validly issued which has become void by the occurrence of any condition therein prescribed invalidating the same—Shall be fined under this title, imprisoned not more than 25 years (if the offense was committed to facilitate an act of international terrorism (as defined in section 2331 of this title)), 20 years (if the offense was committed to facilitate a drug trafficking crime (as defined in section 929(a) of this title)), 10 years (in the case of the first or second such offense, if the offense was not committed to facilitate such an act of international terrorism or a drug trafficking crime), or 15 years (in the case of any other offense), or both.”

SUMMARY OF INVESTIGATION AND PROBABLE CAUSE

8. On December 17, 2015 a person who identified himself as "Kofi Sarpdarwa Jonah" submitted a rental application to Jasper, a luxury apartment complex located in San Francisco, CA. On February 24, 2016, as a form of identification, he provided the following Ghanaian passport:



9. The individual also presented the Jasper with a document that purported to be a "Bank Proof of Funds" from HSBC. That document stated that the individual, Kaffee Sarpdarwa Jonah, possessed a bank account containing 80 million Euros. The document also stated that Jonah is a dual Ghanaian and British Passport holder with passport number PHT701485. The

document later references Jonah's British Passport Number, however the number, PHT701585, differs from what was previously stated. Below is a picture of the document:

HSBC

HSBC BANK PLC
8 CANADA SQUARE, LONDON E14 5HQ
TELEPHONE: +44 207 891 6122
FAX: +44 207 892 2959
SWIFT CODE HSBC GB22 TELEX: 224 113

BANK PROOF OF FUNDS

DATE: FEBRUARY 16, 2016

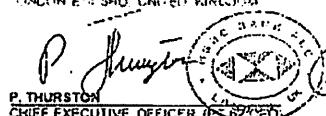
WE THE UNDERSIGNED OF HSBC BANK PLC WITH ADDRESS AT 8 CANADA SQUARE, LONDON E14 5HQ, UK CONFIRM WITH FULL BANK RESPONSIBILITY THAT THE ACCOUNT HOLDERS, ROBOTICS TECHNO HOLDINGS LTD, REPRESENTED AND OWNED BY MR KAFFE SARPDARWA JONAH, HOLDER OF DUAL GHANAIAN AND BRITISH PASSPORT NUMBER PHT701485, HAVE CASH FUNDS OF EIGHTY MILLION EUROS CURRENCY (€80,000,000.00) PRESENTLY ON DEPOSIT IN THE ABOVE REFERENCED ACCOUNT AS DESCRIBED BELOW

AMOUNT	€80,000,000 (EIGHTY MILLION EUROS)
ACCOUNT NUMBER	91313861
ACCOUNT NAME	ROBOTICS TECHNO HOLDINGS LTD
ACCOUNT SIGNATORY	MR KAFFE SARPDARWA JONAH
BANK NAME	HSBC BANK PLC
BANK ADDRESS	8 CANADA SQUARE, LONDON E14 5HQ, UK
BANK OFFICER	S.T. GULLIVER
CASH OFFICER	STCOP (STC 73 D)
CEP. OFFICER	PT. 82 CEO
CEP. SIGNER	283401
BANK TEL. NO.	+44 (0)20 7922 4888
BANK FAX NO.	+44 (0)20 7922 4820

WE FURTHER CONFIRM THAT THESE FUNDS ARE CLEAN, CLEAR AND OF NON-CRIMINAL ORIGIN AND HAVE BEEN LEGALLY DERIVED FROM THE SOURCE OF NORMAL COMMERCIAL ORIGIN AND FREE FROM ANY LIENS AND ENCUMBRANCES.

WE IRREVOCABLY CONFIRM WITH FULL BANK RESPONSIBILITY THAT THESE FUNDS CAN BE AUTHENTICATED AND VERIFIED FOR ABOVE REFERENCED TRANSACTION CODES/IS. WE ARE PREPARED TO FACILITATE THE VERIFICATION/ AUTHENTICATION OF THESE FUNDS ON OUR CLIENT INSTRUCTION THROUGH ROBOTICS LTD. THE SAID DEPOSITED FUNDS HEREIN CAN BE AUTHENTICATED AND VERIFIED BY OUR LOCAL BANK TO BANK BASIS.

FOR AND ON BEHALF OF HSBC BANK PLC
8 CANADA SQUARE
LONDON E14 5HQ, UNITED KINGDOM

P. THURSTON
CHIEF EXECUTIVE OFFICER (PT 82 CEO)

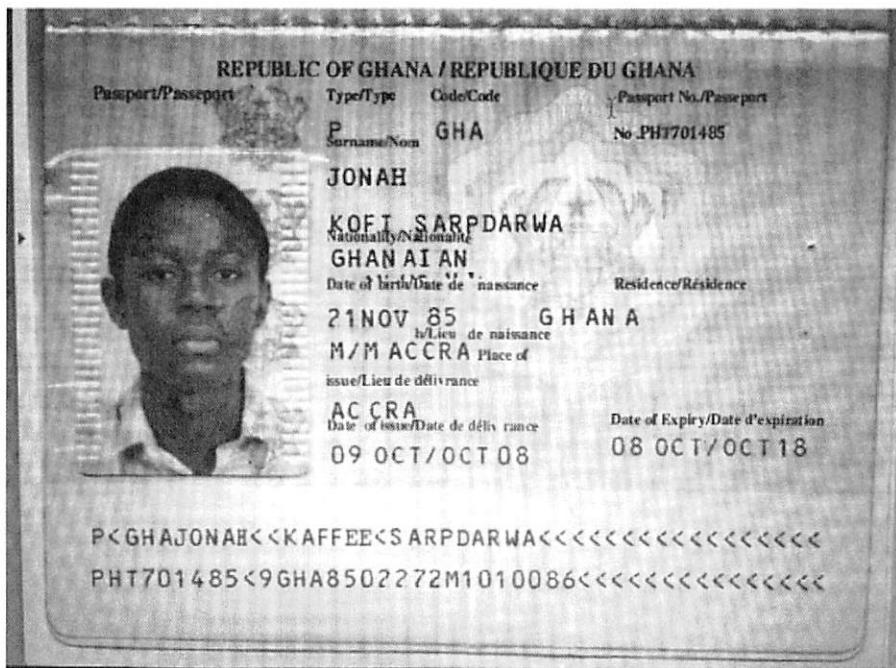
S.T. GULLIVER
DIRECTOR (STC 73 D)

10. The document was purportedly dated February 16, 2016, and purportedly signed by "P. Thurston," the CEO. According to several publicly available news articles, Paul Thurston was the CEO of HSBC until December 2012, when he retired. Although I have not verified this fact, it seems likely that this document was forged.

11. The individual entered into a rental agreement beginning on March 1, 2016, and it was not scheduled to expire until February 28, 2017. The individual received one month concession on the rent. The individual also submitted another rental application to rent another unit on March 30, 2016 with an end date of March 31, 2018. The individual never paid rent on either unit and he eventually accrued approximately \$43,512.28 in unpaid rent and utilities. Jasper accumulated additional costs and legal fees associated with the eviction process. On May 18, 2017, the Superior Court of California in the County of San Francisco entered a judgment in

favor of Jasper apartments allowing them the Jasper to evict the individual for unpaid rent. On June 29, 2016, Jasper received the Eviction Restoration Notice for both units rented to the individual.

12. In June 2017, I ran the individual's name and date of birth as shown in the Passport photocopy through public records and law enforcement databases. I did not find any matches. I later discovered a website, kofiledtome.blogspot.com, documenting instances where an individual named Kofi Dankwah had defrauded other individuals. The alleged situations were first documented on January 8, 2014 to the most recent in August 3, 2016. On August 3, 2016, the website posted an image of the passport that was also presented to the Jasper during the rental of the two units. The website stated that "he has been photoshopping new names on the document as attested to from the recent girl he scammed." It continues by stating "here's one version of the passport." I have reached out to the website moderator, but I have yet to receive a response.



13. The photos of the individual on the website were also verified by three employees at Jasper as being the individual who rented the two units. I ran the name Kofi Dankwah in public and law enforcement databases, and I eventually found a California Driver License for an individual named "Kofi Sarpong Dankwah."



14. I queried Dankwah through immigration databases and found immigration records beginning in 2004, Dankwah's initial date of entry into the United States, to a request in May 2017 to replace his permanent resident card. The photos in the immigration records match the California Driver License and those posted on the website kofiliedtome.blogspot.com. In addition the immigration records, document the individual's true name as "Kofi Sarpong Dankwah."

Conclusion

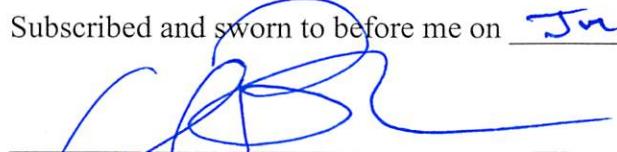
15. For the reasons stated above, I believe there is probable cause to believe that, on or after March 30, 2016, DANKWAH unlawfully used or attempted to use a false, forged counterfeited, mutilated, or altered passport, or an instrument purporting to be a passport, in violation of 18 U.S.C. § 1543.

Respectfully submitted,



CALVIN WONG
Special Agent, HSI

Subscribed and sworn to before me on Jun 27, 2017



HON. LAUREL BEELER
UNITED STATES MAGISTRATE JUDGE